



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

EPA Region 5 Records Ctr.



225808

OCT 01 1996

REPLY TO THE ATTENTION OF
SE-5J

VIA FACSIMILE AND U.S. MAIL

Mr. J. Dan White
Kerr-McGee Chemical Corporation
123 Robert S. Kerr Avenue
Oklahoma City, Oklahoma 73102

RE: Responses to Comments on the Scoping and Planning Documents -
Lindsay Light II Site, Chicago, Illinois dated 9/12/96, Grant
Correspondence Number 5022.006

Dear Mr. White:

The United States Environmental Protection Agency ("U.S. EPA") has completed its review of the above-referenced document dated September 12, 1996. The document is approved as of October 1, 1996, if you incorporate all the changes listed below. Also, the U.S. EPA would like to review Work Orders as they become available. The required changes are as follows:

- 1) Page 3, Response 8: The replacement language still does not say U.S. EPA has the final responsibility for verification determinations.
- 2) Page 4, Response 12: The response should also state what will happen if gamma survey meter results indicate contamination.

Contaminated asphalt could be power washed (or cleaned by a comparable method) if found to be contaminated and then checked. If data can support unrestricted release, there is no reason to have the asphalt disposed of as contaminated material.

- 3) Page 5, Response 15: The use of CA-6 material as a temporary parking lot cover material during the winter should be considered. This would allow the lot to be used during the winter and facilitate the asphaltting of the lot in the spring with minimal additional work or cost.

- 4) Page 6, Response 17: The language on the sign should either read "This parking lot is undergoing Environmental Remediation pursuant to an Unilateral Administrative Order issued by the U.S. EPA, etc." or any reference to U.S. EPA should be deleted.

- 5) Page 7, Response 18: By this method, background should be assumed to be zero. The text should reflect this assumption.

6) **Page 16, Response 52:** Decontamination should be performed in a manner to minimize the risk of exposure. The change currently provided in Response 52 was based on the donning of two pairs of gloves, inner and outer gloves, and the procedure enclosed. U.S. EPA understands that you presently wear only one pair of gloves which are cloth so when the excavation begins, please change your decontamination procedure to follow the enclosure. The enclosed procedure was reproduced from USEPA's **Standard Operating Safety Guides** - Publication 9285.1-03, PB92-963414 - June 1992.

7) **Page 16, Response 54:** Same comment as in 5) above.

8) **Page 18, Response 58:** Surface contamination limits are those of U.S. Nuclear Regulatory Commission ("NRC") Regulatory Guide 1.86 unless there are no comparable ones, in which case, Illinois Department of Nuclear Safety limits should apply. See Kerr-McGee comment 67.

9) **Page 19, Response 62:** Same comment as in 8) above.

10) **Page 21, Response 71:** This response did not address the issue of fixed contamination on workers. The response should be completed.

11) **Table 3-1, footnote b:** See Response 26. Four air monitors are to be in place.

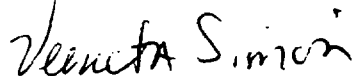
12) **Table 3-4, footnote b, line 9:** Typo. 6-% should be 60%.

13) **Table 7-1, item a:** It is inconsistent to use 3 times the NRC Regulatory Guide 1.86 level for "Contamination on smear samples" and 30% DAC on "Airborne radioactivity." Consideration, at least, of modified Level C should occur at something less than 1 time the NRC guideline.

14) **Table 7-1, items a, b, c:** It is not stated what levels will require mandatory actions. This level should be stated.

If you have any questions or comments, please contact me at (312) 886-3601 or facsimile (312) 353-9176.

Sincerely,



Verneta Simon
On-Scene Coordinator

Enclosure

MAXIMUM MEASURES FOR LEVEL C DECONTAMINATION

Station 1	Segregated Equipment Drop	Deposit equipment used on-site (tools, sampling devices and containers, monitoring instruments, radios, clipboards, etc.) on plastic drop cloths or in different containers with plastic liners. Segregation at the drop reduces the probability of cross contamination. During hot weather operations, a cool-down station may be set up within this area.
Station 2	Boot Cover and Glove Wash	Scrub outer boot covers and gloves with decon solution or detergent and water.
Station 3	Boot Cover and Glove Rinse	Rinse off decon solution from Station 2 using copious amounts of water.
Station 4	Tape Removal	Remove tape around boots and gloves and deposit in container with plastic liner.
Station 5	Boot Cover Removal	Remove boot covers and deposit in containers with plastic liner.
Station 6	Outer Glove Removal	Remove outer gloves and deposit in container with plastic liner.
Station 7	Suit and Boot Wash	Wash splash suit, gloves, and safety boots. Scrub with long-handle scrub brush and decon solution.
Station 8	Suit, Boot, and Glove Rinse	Rinse off decon solution using water. Repeat as many times as necessary.
Station 9	Canister or Mask Change	If worker leaves exclusion zone to change canister (or mask), this is the last step in the decontamination procedure. Worker's canister is exchanged, new outer gloves and boot covers are donned, and joints are taped. Worker returns to duty.
Station 10	Safety Boot Removal	Remove safety boots and deposit in container with plastic liner.
Station 11	Splash Suit Removal	With assistance of helper, remove splash suit. Deposit in container with plastic liner.
Station 12	Inner Glove Removal	Wash inner gloves with decon solution.
Station 13	Inner Glove Wash	Rinse inner gloves with water.
Station 14	Face Piece Removal	Remove face piece. Deposit in container with plastic liner. Avoid touching face with fingers.
Station 15	Inner Glove Removal	Remove inner gloves and deposit in lined container.
Station 16	Inner Clothing Removal	Remove clothing soaked with perspiration and place in lined container. Do not wear inner clothing off-site since there is a probability that small amounts of contaminants might have been transferred in removing the fully-encapsulating suit.
Station 17	Field Wash	Shower if highly toxic, skin-corrosive, or skin-absorbable materials are known or suspected to be present. Wash hands and face if shower is not available.
Station 18	Redress	Put on clean clothes.

MAXIMUM DECONTAMINATION LAYOUT FOR LEVEL C PROTECTION

